To: Carolyn Yale/R9/USEPA/US@EPA; Karen Schwinn/R9/USEPA/US@EPA:Tom Hagler/R9/USEPA/US@EPA[]; aren Schwinn/R9/USEPA/US@EPA;Tom Hagler/R9/USEPA/US@EPA[]; om Hagler/R9/USEPA/US@EPA[] From: "Obegi, Doug" Sent: Wed 6/25/2008 9:29:37 PM Subject: Thank you 6-24-08 member letter on BDCP.PDF 2008-05-29 CFBF BDCP Conveyance WG Technical, Map, and Original Cover.pdf Dear Karen, Tom and Carolyn, Thanks again for sharing 2 hours of your time with me this morning; it was very helpful as I get up to speed and try to develop strategies to deal with these multi-headed hydras... As promised, attached are (1) the Farm Bureau BDCP water quality proposal and (2) the Congressional letter on salmon. My very preliminary notes on the Delta Vision strategic plan are below. Keep in touch... Feel free to call or email me anytime. Take care,

The take home message I got: in order to maintain average diversions of the 1990s while restoring the delta ecosystem (Without guaranteeing survival of any individual species), we need to invest tens of billions of dollars for new infrastructure (conveyance, storage) and habitat restoration.

The Bad:

Doug

- * Water quality recommendations (p. 53) are incredibly weak. Almost nothing new, and no indication that the strategy would actually clean up WQ and meet existing standards. Focuses on existing BMPs and ag waivers, nothing new. No water quality performance measures. (5)
- * Supports new water bonds for surface storage, including public payment for them. Suggests State participate in raising Shasta dam. (p. 62-63)
- * Supports PC/dual conveyance and suggests that DV will not do any further analysis of ecological impacts of this proposal. (61) Wants bigger capacity for conveyance (39).
- * Proposes to plug existing delta users into new conveyance, but doesn't address nonconsumptive water quality (salinity and other) in the Delta.
- * Co-equal goals means that some species may go extinct? (2)
- * Rejects reduced exports as not meeting co-equal goals (61)

- * No salmon ecosystem goal or performance measure (5)
- * No discussion of reoperation of existing reservoirs to better protect ecosystems; only discussion relates to flood control ()
- * No agricultural water use efficiency performance target (10)
- * Seeks to streamline the water transfer process (9, 47-48)

The Good:

- * Defines water supply reliability as exports / diversions "consistent with average quantities diverted in the 1990s" (59-60); seeks to increase fall outflow, and focus diversions / exports during wet periods (years and seasons)
- * Encourages good flood management, integrating floodplains and wetlands (30, _);
- * Establishes good urban water efficiency, recycling and reuse goals (including AB 2175 by name) (41-45); some discussion of improving Ag water efficiency, including suggestion that the ag waiver exemption be contingent upon installation and maintenance of state of the art drip or micro irrigation systems, or other technology to eliminate return flows. (44-45)
- * Seeks to impose a new restoration fee as part of financing mechanism; although the details are hazy, it does mention a per acre-foot fee for water diversions, not just the water projects, as well as tiered pricing for water and some support for the CALFED financing principles (e.g., beneficiary pays principle) (23-26);
- * States that "water required to support and revitalize the Delta will not be purchased but will be provided within the [sic] California's system of water rights and the constitutional principles of reasonable use and public trust." (23)'
- * States that "physical habitat restoration by itself is not enough. It is also necessary to restore appropriate water quality and flows within those physical structures." (28)

Governance and Delta as Place Recommendations:

I didn't look too closely at these. The Delta as Place Recommendations appears similar to our comments. The Governance recommendations do propose a new state water master of sorts, and transfer of the SWP from DWR, but despite that, I'm not really sure that the changes are all that significant. The science proposal seems like an extension of the ISB/ CalFed science panel. The day to day operations team seems similar to existing management structure. But I didn't look at these in depth.

Doug Obegi
Staff Attorney
Western Water Project Natural Resources Defense Council
111 Sutter Street, 20th Floor

San Francisco, CA94104

415.875.6100 (phone)

415.875.6161 (facsimile)